

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN,
ELVIRA BUMPUS, RONALD BIENDSEI,
LESLIE W. DAVIS, III, BRETT ECKSTEIN,
GEORGIA ROGERS, RICHARD
KRESBACH, ROCHELLE MOORE, AMY
RISSEEUW, JUDY ROBSON, JEANNE
SANCHEZ-BELL, CECELIA SCHLIEPP,
TRAVIS THYSSEN and CINDY BARBERA,

Case No. 11-C-562
JPS-DPW-RMD

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE
MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his official
capacity: MICHAEL BRENNAN,
DAVID DEININGER, GERALD NICHOL,
THOMAS CANE, THOMAS BARLAND,
TIMOTHY VOCKE, and KEVIN KENNEDY,
Director and General Counsel for the Wisconsin
Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants

VOCES DE LA FRONTERA, INC., RAMIRO
VARA, OLGA VARA, JOSE PEREZ, and
ERICA RAMIREZ,

Plaintiffs,

v.

Members of the Wisconsin Government Accountability Board, each only in his official capacity: MICHAEL BRENNAN, DAVID DEININGER, GERALD NICHOL, THOMAS CANE, THOMAS BARLAND, TIMOTHY VOCKE, and KEVIN KENNEDY, Director and General Counsel for the Wisconsin Government Accountability Board,

Case No. 11-CV-1011
JPS-DPW-RMD

Defendants.

Defendants' Motion for Summary Judgment on Counts 2-6 and 8 As Alleged by the *Baldus* Plaintiffs, Counts 4 and 5 As Alleged by the *Baldwin* Intervenor-Plaintiffs and the Single Count As Alleged by the Consolidated *Voces De La Frontera* Plaintiffs

Defendants Michael Brennan, David Deininger, Gerald Nichol, Thomas Cane, Thomas Barland, and Kevin Kennedy (each in their official capacity), by the undersigned attorneys, hereby move for summary judgment on counts 2-6 and 8 of the Second Amended Complaint filed by the original *Baldus* plaintiffs, counts 4 and 5 of the intervenor *Baldwin* plaintiffs and on the single count of the Complaint filed by the consolidated *Voces De La Frontera* plaintiffs. In support of this motion, defendants submit herewith a supporting brief, a statement of proposed findings of fact and an affidavit of Daniel Kelly.

Dated this 10th day of February, 2012.

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-3519
(608) 267-2223 (fax)
lazarms@doj.state.wi.us

J.B. VAN HOLLEN
Attorney General

MARIA S. LAZAR
Assistant Attorney General
State Bar #1017150

Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202
Telephone: 414-298-1000
Facsimile: 414-298-8097

/s/ Daniel Kelly
Patrick J. Hodan
WI State Bar ID No. 1001233
phodan@reinhartlaw.com
Daniel Kelly
WI State Bar ID No. 1001941
dkelly@reinhartlaw.com
Colleen E. Fielkow
WI State Bar ID No. 1038437
cfielkow@reinhartlaw.com
Attorneys for Defendants

REINHART\8333260